

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In re:	:
	: In Chapter 13
FRANCIS P. O'BRIEN, and	:
THERESA L. O'BRIEN,	: Bankruptcy No. 16-16972 (MDC)
	:
Debtors.	:

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**ENTRY OF APPEARANCE, REQUEST FOR  
SERVICE OF PAPERS, AND RESERVATION OF RIGHTS**

**PLEASE TAKE NOTICE** that the undersigned hereby appears as counsel for Central Penn Capital Management LLC ("**Central Penn**"), and requests that all notices given or required to be given and all papers served or filed in connection with this Chapter 11 case be given to and served upon:

James C. Vandermark, Esquire  
White and Williams LLP  
1650 Market Street, 18<sup>th</sup> Floor  
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**PLEASE TAKE FURTHER NOTICE** that the foregoing request encompasses all notices and pleadings referred to in Rules 2002, 3017 and/or 9007 of the Federal Rules of Bankruptcy Procedure, including, without limitation, notices of any orders, motions, demands, complaints, petitions, pleadings, applications and any other documents or requests brought before this Court in this Chapter 11 case, whether formal or informal, written or oral, or transmitted or conveyed by mail, messenger, telephone, telegraph, telecopier or otherwise (1) that affects or seeks to affect in any way any rights or interests of any creditor or party-in-interest in this case, including Central Penn, with respect to:

(a) the Debtor or the trustee appointed in this case; (b) property of the Debtor's estate, or proceeds thereof, in which Central Penn may claim an interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtor or the trustee may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or other conduct by the Debtor, the trustee, or any other party-in-interest.

**PLEASE TAKE FURTHER NOTICE** that Central Penn intends that neither this Request for Service of Notices and Pleadings nor any later appearance, pleading, claim, or suit shall waive (1) the right of the Central Penn to have final orders in non-core matters entered only after de novo review by a United States District Judge, (2) the right of Central Penn to arbitration and/or trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) the right of Central Penn to request the United States District Court to withdraw the reference or to abstain, in any matter subject to mandatory or discretionary withdrawal or abstention, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which Central Penn is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments Central Penn expressly reserves.

Philadelphia, Pennsylvania  
November 7, 2018

**WHITE AND WILLIAMS LLP**

/s/ James C. Vandermark  
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Management LLC*